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April 16, 2024

The requested extension is GRANTED.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: April 16, 2024

VIA ECF

The Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Room 520
New York, NY 10007

RE: *United States of America v. Robert Piaro*
Case No.: 23 CR 420 (AS)

Dear Judge Subramanian:

The Defendant Robert Piaro (“Mr. Piaro”) by undersigned counsel, respectfully submits this letter, with the Government’s consent requesting the Court to modify the pretrial briefing schedule with respect to discovery matters only. [Mr. Piaro requests the Court extend the deadline for Mr. Piaro to file discovery motions by thirty \(30\) days.](#) The reasons are set forth below.

As indicated by the undersigned in the December 5, 2023 Letter Motion regarding the pretrial schedule, extensive and voluminous discovery has been produced by the Government which has taken Counsel a great amount of time to analyze. By extension, it has taken a large amount of time and effort to identify discovery issues to raise with the Government prior to filing motions related to discovery. Discovery is ongoing, and Mr. Piaro’s Counsel has conferred with Counsel for the government and has identified the issues, these include the following: files that are password protected with no password, empty directories and/or files, files that are damaged and cannot be opened, etc. Counsel and the Counsel for the government have been conferring and are working diligently to resolve these issues. Undersigned Counsel is confident the issues will be amicably resolved.

Further, Mr. Piaro’s counsel has conferred with counsel for the government, who has consented to a thirty-day extension of the pretrial briefing schedule for pretrial motions relating to the production of discovery only. This will give the parties a reasonable amount of time to resolve the outstanding discovery issues, as required by Loc. Crim. R. 16.1. Mr. Piaro therefore

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respectfully asks this Honorable Court to grant a thirty (30) day extension of the deadline for Mr. Piaro to file pretrial motions directed to discovery matters only.

Respectfully submitted,

/s/ Brian A. Muenchenbach

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(Admitted *Pro Hac Vice*)

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cc: All counsel of record (via ECF)